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United States District Court
Eastern District Of New York

Amended
Complaint

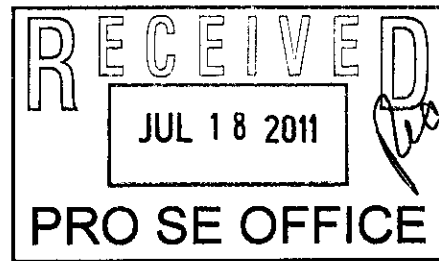
Robert L. Shapiro,
Plaintiff.

Jury Trial Demanded

The Geo Group, Inc.
George C. Zoley
Miss Gittens
Wendy Montgomery
Gregory Carter

Defendants.

11 CV 3375



- I. Parties:
Plaintiff Robert Shapiro resides at 988 Myrtle Avenue, Brooklyn
Defendant Geo Group, Inc., resides at 621 NW 53rd Street;
Boca Raton, Florida 33487
Defendant George Zoley resides at 621 NW 53rd Street;
Boca Raton, Florida 33487
Defendant Miss Gittens resides at 988 Myrtle Avenue, Brooklyn
Defendant Wendy Montgomery resides at 988 Myrtle Avenue;
Brooklyn, New York 11206
Defendant Gregory Carter resides at 147 Pierrepont Street,
Brooklyn, New York 11201

- II. The jurisdiction of the Court is invoked pursuant to 28 USC 1983
and Bivens v. Six (6) Unknown Federal Narcotics Agents.

- III. Statement of Claim:

Plaintiff is an elderly man suffering from testicular cancer, diabetes, epilepsy & heart disease. Plaintiff served an 18 year federal prison sentence imposed by the late Honorable Judge David Trager. Plaintiff was released from the federal prison in Edgefield, South Carolina in 2008. After a year or so on federal

supervised release, I was incarcerated for 9 months in the federal detention center here in Brooklyn, New York for a “violation” of my supervised release. Plaintiff is supervised by Senior Probation and Parole Officer...Gregory Carter...a federal agent employed by the Department of Justice. Judge Allyne Ross, Eastern District of New York took over my case when federal judge David Trager died of cancer. Judge Ross released me from detention and sent me to the federal half way house located at 988 Myrtle Avenue, Brooklyn, NY 11206 for my “violation”. In my few months on Myrtle Avenue, the defendants have harassed me and denied me constitutional rights under our federal constitution. The half-way house is run and maintained by a private company the GEO Group, Inc., located in Boca Raton, Florida under a contract with the United States Department of Justice.

The defendants are:

The Geo Group, Inc. – operator of the half way house under contract with the Department of Justice

George Zoley – Chairman of the Geo Group, Inc.

Miss Gittens – case manager at the half way house

Wendy Montgomery – Administrator of the half way house

Gregory Carter – Federal Probation and Parole officer

The gist of my complaint is four fold:

1. The defendants are not allowing me to attend Jewish services on Saturday afternoons. The defendants claim that there is a “rule” limiting me to one (1) service a week. This is a lie and is deceitful. A reading of the the half way house rule book belies and gainsays this position. On page 16 of the rule book, it states: “RESIDENTS ARE PERMITTED TO ATTEND SERVICES OF THEIR CHOICE”. Services are plural....not singular. So the defendants are lying about this. It is true that I attend Quaker services each Sunday. But I have the right to attend Jewish services on Saturday, as is my wont. Defendant Montgomery had the temerity to tell me that Jewish services and Quaker services are “contradictory” so I could not go to both. According to Montgomery...Jewish services are NON CHRISTIAN and Quaker services are Christian....so I can not be allowed to attend “contradictory” services. I don’t have to

choose which services to attend. They are denying me a federal right, under our federal constitution, to enjoy religious freedom.

2. The defendants will not allow me to go to the federal courthouse to file my pro se motions and civil suit to do legal research. I am not represented by an attorney. I am proceeding pro se in my legal matters. Our constitution gives all citizens the right to seek redress in our federal court system. This is another violation of federal constitutional rights.
3. The defendants will not allow me to pick up my 10 or 12 medications from the pharmacy. They claim that have no documentation. This is endangering my health. Over the 4th of July weekend I had chest pains, for lack of medication. On 7/5/11, I was taken to the hospital by ambulance. I declined to stay overnight. Plaintiff has a fear of hospital. So, I returned to the half way house on Myrtle Avenue in Brooklyn.
4. Plaintiff needs chemotherapy and radiation to try and curtail my testular cancer. I already had one operation and may need another one. A doctor told me that my cancer will spread, more than likely. The defendants will not allow me to go to Sloan-Kettering cancer hospital in Manhattan for treatment.

No documentation, they say.

The question that begs an answer is.....if I can't go out..... how do I procure "documentation"?

The bottom line:

Federal probation officer Carter was disappointed that federal Judge Ross sent me to the half way house on Myrtle Avenue in Brooklyn instead of keeping in detention at MDC Brooklyn on 29th street.

Defendant Carter has enlisted Miss Gittens and Miss Montgomery in his harassment.

Mr. George Zoley, the chairman of the GEO group has taken no action to investigate or intervene. I called him, faxed him, and sent Mr. Zoley a letter asking for his help. Received no response whatsoever. Under 28 USC, section 1332 and the Diversity of Citizenship, and the doctrine of Respondeat Superior, Zoley is responsible for the misconduct of his employees....Montgomery and Gittens. Accordingly, Zoley can not be held incupable.....nor the GEO Group, Inc. in Boca Raton, Florida.

Defendant Carter is a federal probation and Parole officer. Under normal circumstances, Carter would be entitled to immunity from this suit.

But Carter has crossed the line and harrassed the plaintiff.....denied him his federal constitutional rights. Accordingly, Carter has departed from his "scope" of his duties. It is not a part of his sworn duties to harrass the Plaintiff and deny the Plaintiff his federal constitutional rights. In view of the foregoing, Carter can not claim immunity.

The half way house is not a jail or a detention facility. Their "mission", posted on the wall at the half way house, is to help Ex offenders "acclimate" back into society. The defendatnts are thwarting this and harrassing the Plaintiff.

I certify that I am proceeding without an attorney.

I certify that I am filing this federal lawsuit in good faith.

I certify that I am a U.S. Citizen entitled to seek redress.

I certify that the doctrines of Res Judicata & Collateral Estoppel do not bar me from filing this federal lawsuit.

Thank you for your considerations.

I respectfully request that this Court **ORDER** the clerk to file my complaint and that the defendants be served with a copy of this complaint, and that the defendants file an "answer" to my complaint, within 30 days.

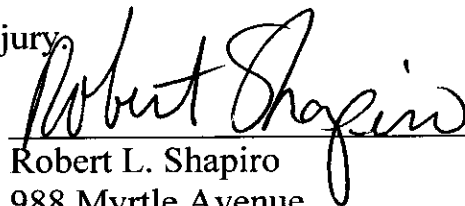
IV. Remedy. State what relief, such as money damages, you seek from each defendant.

The Plaintiff seeks \$10 million dollars in damages from each defendant.
The Plaintiff seeks \$100 million dollars in punitive damages. The punitive damages to be paid equally by the defendants.

Respectfully submitted.

Sworn to under penalty of perjury

Date: 7/6/2011 anno Domini


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